

## **San Bernardino Objection Issues Summary - Wilderness and Roadless**

### **Objectors:**

- **San Geronio Chapter of the Sierra Club**, Joyce Burk
- **California Wilderness Coalition**, Ryan Henson
- **California Wilderness Coalition, California Native Plant Society, and Center for Biological Diversity**, Ryan Henson, Greg Suba, Lisa T. Belenky

### **Summary:**

In general, the Objectors disagree with the San Bernardino National Forest's (SBNF) decision to not recommend wilderness for the Cucamonga C IRA.

The Sierra Club objects to the lack of recommended wilderness for Cucamonga C IRA stating "We would like to explain why it is a grave error of the Forest Service's part not to recommend any wilderness for the Cucamonga C IRA...The adjacent Angeles National Forest deems their Cucamonga A IRA has recommended wilderness and just across the border the San Bernardino National Forest staff deems Cucamonga C as only warranting BCNM protection."

The other objectors assert that describing Cucamonga C IRA as having "low wilderness values and characteristics" in the Draft ROD is not accurate and the objectors provides characteristics of the area that they believe indicate otherwise.

### **Review Team Analysis:**

The SBNF appropriately applied FSH 1909.12, Chapter 70, evaluating areas for potential recommendation as wilderness by completing assessments of wilderness "capability", "availability" and "need" for the Cucamonga C IRA. The evaluation in FSEIS Appendix 2 adequately describes the capability, availability, and need for Cucamonga C as RW. However, the rationale for the decision in the Draft ROD does not clearly reflect the evaluation described in Appendix 2. There is a clear connection between the evaluation in Appendix 2 and the Draft ROD that Cucamonga C offers limited opportunities for solitude and challenge. However, the Draft ROD did not clearly explain the rationale for concluding that Cucamonga C has "low wilderness values and characteristics, has uses that cannot be effectively managed as wilderness, and is not needed as part of the wilderness preservation system" based on the evaluation in Appendix 2 of the FSEIS.

Portions of the evaluation appear to conflict with this rationale. Although some of the considered factors meet recommended wilderness criteria, it does not necessarily mean that Cucamonga C should be recommended as wilderness. There may be other higher priority factors that outweigh these characteristics and lead the decision maker to not recommend wilderness. However, a clearer connection between the evaluation in Appendix 2 of the FSEIS and the

rationale in the Draft ROD should be made, including identifying any limiting factors that would preclude Cucamonga C from being recommended as wilderness.

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#### REMEDY(S) PROPOSED BY OBJECTORS

- Place the Cucamonga C IRA in the RW zone better protect the upper reaches of Cucamonga Canyon. (Sierra Club – San Gorgonio Chapter)
- We request that the SBNF follow the lead of the ANF and agree to place the Cucamonga C IRA in the RW zone. This will provide appropriate recognition for the area's high wildlife, scenic, recreational and cultural values and create consistency between the two forests. (CWC, CNPS, CBD)

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#### INSTRUCTIONS BEING CONSIDERED

- A more specific rationale should be provided in the Draft ROD that better supports and more clearly connects to the information provided in the IRA evaluation in Appendix 2 of the FSEIS, including if and how any higher value factors may have influenced the draft decision. The improved rationale would replace or supplement the rationale in the Draft ROD for Cucamonga C IRA.